

CDBC.VRS-DWCC Comments to CAV’s Answers to CRTC RFI Q28-Q31:

Topic 6: Quality of Standards & Metrics

This document from **CDBC.VRS-DWCC** focuses on the Quality of Standards & Metrics

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Executive Summary

ES 1: CDBC.VRS-DWCC commends the CAV for achieving its standard of 80% of calls to be answered within 120 seconds with a 90-95% rate. However, the CAV must not be complacent with its current standard of 80% and is strongly encouraged to ambitiously raise its standard to maintain a higher answered call rate.

ES 2: In addition to the high answered call rate, **CDBC.VRS-DWCC** applauds the CAV for striving for language equality with ASL and LSQ by waiting 30 seconds for each language, which has been accomplished with ASL but understands its challenges with LSQ. Their efforts in reducing LSQs from the 40s to the mid-30s are admirable.

ES 3: Furthermore, **CDBC.VRS-DWCC** is impressed with the significant decrease in the abandoned call rate from 10% to 5%. This reduced rate is due to increased VIs due to the COVID-19 pandemic. This reduced abandoned rate made it possible for calls to be responded to quickly, and *SRV Canada VRS* users do not have to wait in a queue for long.

ES 4: Committee Members thought CAV or must measure the number or usage of transfers by VIs somehow to enhance quality for the *SRV Canada VRS* users to ensure a high-quality VRS experience. Guidelines for VIs are good in encouraging VIs to minimize transfers and limit their frequency, but they are inadequate alone. There needs to be a greater expectation that once a VI starts a VRS call, they are expected to complete it and not to transfer halfway through except for intensive and lengthy VRS calls.

ES 5: Interestingly, the average call length has increased from 5.1 to 7.1 minutes. It is curious about the type of calls that have contributed to this kind of growth. **CDBC.VRS-DWCC** wonders if there could be detailed reports. We suggest a scroll-down option for VIs to identify the type of call it was upon its completion. It would provide us with a more specific overall picture of the usage of *SRV Canada VRS*.

ES 6: CDBC.VRS-DWCC commends the CAV for virtually eliminating outages from 2,718 minutes in 2018 to 433 in Q1 in 2021 and changing to a different Canadian provider when it was experiencing many problems and outages. It is greatly appreciated that the outages have been significantly reduced to minimize disruption to this essential service for *SRV Canada VRs* users. However, we are concerned about the lack of access to the daily outage reports and would like them directly posted publicly on CAV's website.

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ES 7: CDBC.VRS-DWCC demands that the CRTC prioritize communication equity for *SRV Canada VRS* users. This prioritizing means the CAV always maintains a minimum of 99.97% of redundancy and reliability connections to minimize the number of missed calls. Additionally, the CAV must ensure video quality of all VRS calls is top-notch regardless of what type of internet or cellular connection the users use. The kind of data plan a user has creates a communication inequity should they not have the correct type due to affordability reasons. Think static on voice calls, but it's choppy for video calls.

ES 8: CDBC.VRS-DWCC is not surprised by the increased number of calls. The impact of the COVID-19 pandemic and the rising number of registered users were apparent factors. However, we think there needs to be a more aggressive increase in the number of subscribers across Canada, especially now that *SRV Canada VRS* has been operating 24/7/365 since October 2017.

Methodology

1. Three members of the DWCC participated in this topic of quality of service and metrics, all bringing in their years of experience with *SRV Canada VRS* since its launch. The team leaders sent the questions and CAV's responses to the Committee members to provide comments from their experiences and perspectives.
2. Each Committee Member (CM) is assigned a number, and it is their words that they contribute. For example, one member will be labelled and identified as "CM#2." The following Committee numbers participating in this Response are **CM#2**, **CM#10**, and **CM#17**.
3. To create a flow between the questions, one Committee member consultant pulled all the answers together and tied up the response for each question, summarising the answers together for each question in the same numbered Response (R#).

General Comments

4. **CDBC.VRS-DWCC** thinks it is agreeable to maintain 50% of VIs to work remotely to ensure adequate interpreters are available to respond to VRS calls.

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QUESTION 28

Q28. Describe any quality of service standards established by the CAV and provide metrics associated with these standards from the launch of the service to present, broken down monthly if possible.

5. **CM#17** says there are different ways to think of the quality of service. CRTC defines it as a high-quality communications system generally monitoring network utilization based on various technical parameters and quality metrics, including download speed, upload speed, jitter, packet loss, and latency.

Answered Calls

6. **CDBC.VRS-DWCC** applauds the CAV for achieving a rate of between 90 and 95% of calls to be answered within 120 seconds. This rate is well above its standard of a minimum of 80%.
7. It is understandable that the answered call rate of LSQ is slightly lower than that of ASL but has exceeded CAV's established standard by over 10%, which is still admirable.

Video Interpreter Transfer

8. **CM#10** disagrees with CAV's neglecting the transfer rate as a measure of user satisfaction for *SRV Canada VRS* users and says that this must be measured. This is a crucial component of ensuring a high-quality VRS experience.
9. **CM#2** suggests the CAV publicly share the number of complaints related to call interruptions due to the VI transferring.

Other Comments

10. **CM#2** finds the quality of service and metrics established by CAV acceptable.

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QUESTION 29

Q29. What are the CAV's recommendations on appropriate minimum quality of service standards?

Answered Calls

11. **CM#10** thinks that since CAV has achieved its minimum standard of 80% of calls to be answered within 120 seconds, CAV should change this standard with more ambitious targets.
12. **CDBC.VRS-DWCC** firmly believes that the CAV must not be complacent with its current standard of 80% calls answered within 120 seconds and suggests raising the bar to 90% of calls answered within 90 seconds.

Average Wait Time

13. **CM#10** thinks it's admirable of CAV to strive for language equality with ASL and LSQ. However, it may be more reasonable to set slightly different goals for each language to be realistic and attainable. Thirty seconds for ASL is easily achievable and should remain so. As for LSQ, CAV should adjust the plan slightly to 35 seconds.

Abandon Rate

14. **CM#10** think that 5% is reasonable as it is virtually impossible to avoid all abandoned calls.

Video Interpreter Transfer

15. **CM#10** thinks guidelines to minimize transfers and limit their frequency are good but are insufficient by themselves.
16. Video Interpreters' minimal response on transferring to other VIs is unacceptable. It needs to be formally addressed as it is an essential component of customer satisfaction by *SRV Canada VRS* users.

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Video Quality

17. **CM#17** says if the video is choppy and the *SRV Canada VRS* user is missing some signs, then that is no different from a static sound on a regular voice call.
18. **CM#17** wonders why CAV is not reporting on video quality and that it is wrong not to do so as it affects the *SRV Canada VRS* users, their employment, and their access to emergency services.
19. **CDBC.VRS-DWCC** wonders why this was not added as a question for CAV to respond to as it is a crucial component of Quality of Service. A user cannot fully access VRS calls if the video quality is substandard.

QUESTION 30

Q30. Provide the following performance statistics from the launch of the service to the present, broken down monthly if possible:

- a. **Average wait times for an interpreter, broken down by ASL and LSQ**
- b. **Average call duration**
- c. **The number of ASL and LSQ calls is broken down by relay and point-to-point calls.**
- d. **Number of subscribers**
- e. **Number of dropped calls, broken down by ASL and LSQ**
- f. **Number of abandoned calls, broken down by ASL and LSQ**
- g. **Number of calls not accepted by the person being called**
- h. **Number and duration of outages, including the number of unplanned outages and the cause of each**

Average Wait Time

20. **CDBC.VRS-DWCC** is impressed with CAV's achieving its goal of 30 seconds or less for the average wait time system-wide.
21. **CM#10** said they occasionally would have to wait in line for an available ASL interpreter, but it was within reason, perhaps less than a minute.

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22. Waiting time may not be functionally equivalent to hearing people, where they can connect with calls immediately upon dialling the number. External human factors made this challenging, so it is understandable.
23. Understandably, LSQ lags behind ASL by 10 seconds in its average wait time.
24. **CM#10** is pleased to see LSQ's average wait time dropping from the 40s in 2018 to the mid-30s in Q1 2021.

Average Call Duration

25. **CDBC.VRS-DWCC** finds it attractive that the average call length has increased by 39%, from 5.1 to 7.1 minutes.
26. **CM#10** is curious about the type of calls that have contributed to this kind of growth and wonders if there could be better reports
27. **CM#10** suggests a scroll-down option for VIs to identify the type of call it was upon completion of a call. This would assist with obtaining a more specific overall picture of how its users use SRV Canada VRS.

Number of Calls

28. **CDBC.VRS-DWCC** is not surprised that the number of calls has increased. This is a result of two factors: the increased number of registered users and the impact of the COVID-19 pandemic.

Subscribers

29. **CM#2** says that we need a more aggressive number of subscribers across Canada. This is especially important as SRV Canada VRS has been operating 24/7 since October 2017.
30. **CM#10** thinks the number of 1,625 registered users in 2106 to 8,271 registered users in Q1 2021 seems to be a gradual rather than exponential growth.

Dropped Calls

31. **CDBC.VRS-DWCC** has no response to CAV's answer to this question.

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Abandoned Calls

32. **CDBC.VRS-DWCC** is pleased to see that the abandon call rate has significantly decreased from 10% in 2018 to 5% in Q1 2021.
33. **CM#10** could quickly determine from the table that due to the COVID-19 pandemic, CAV's structuring of a remote work program had attracted more VIs. This program made it possible for calls to be responded to more quickly, and users do not have to wait in a queue for long.
34. It is agreeable to maintain 50% of VIs to work remotely to ensure adequate interpreters are available to respond to VRS calls.

Unaccepted Calls

35. **CDBC.VRS-DWCC** has no response to CAV's answer to this question.

Outages

36. **CM#2** notices that CAV can reduce the number of outages from 2,751 in 2018 to 433 in Q1 2021 and wants to see the CAV posting a daily outage report publicly on its website.
37. **CM#17** thought that CAV must always share the daily outage reports. Nothing informs the public of outages in real-time when they need it. Reporting quarterly is considered information that is too old.
38. **Since its near inception, CM#10** says the SRV Canada VRS users value having complete access to telecommunications, thus appreciating the CAV for its work to minimize disruption to this essential service for everyone.
39. **CM#17** explains to look at outages through the lens of a phone call instead of a video call. If a hearing person gets a voice call and all they have is static on their phone, the service provider will send a tech to fix this as it is non-functional. Now, apply this to video calls - an outage at SRV Canada VRS makes VRS calls non-functional. If there is choppy video, it is an "outage," but the CAV ignores it.
40. **CM #10** says outages create a communication inequity for SRV Canada VRS users in the telecommunications industry and thus must be prevented.
41. While **CDBC.VRS-DWCC** applauds CAV for significantly decreasing the number and minutes of unplanned outages since January 2018. They cannot help but wonder how many outages were not acknowledged or reported to the public.

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QUESTION 31

Q31. For each unplanned outage, provide a description of what was put into place to lessen the frequency of future outages or prevent them where possible.

Problem Solving Initiative

42. **CM#10** applauds the CAV for proactively identifying the major causes of outages, listing them into five categories, and providing estimated percentages of its frequency.
43. **CM#10** applauds CAV for their problem-solving initiatives to significantly eliminate outages by moving to a different Canadian provider.
44. **CM#2** thinks it was the right decision for CAV to move to a different Canadian provider when the prior provider was experiencing many problems and outages. The previous provider's issues led to the VRS service becoming unreliable to reduce the outages negatively impacting SRV Canada VRS users.

Downtime and Uptime

45. **CDBC.VRS-DWCC** praises the CAV for reducing the downtime minutes from 2,751 in 2018 to 433 in 2020 and increasing the uptime percentage from 99.48% in 2018 to 99.92%, but questions who precisely check on the SRV Canada VRS service quality.
46. It appears that CAV self-reports the uptime, so naturally, we are concerned about bending over backward to try and present "uptime" as outages when they are non-outages.
47. If there is a choppy video with a jitter/ping of 500, it is an "outage" but is not reported, under-reported, ignored, or CAV pretends it does not exist.
48. As an SRV Canada VRS user, **CM#10** values every minute of uptime. These uptimes ensure that they have communication equity while using telecommunications.
49. **CDBC.VRS-DWCC** thinks that someone from CRTC needs to stand back and look at the entire outage reporting in greater detail.

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50. **CM#2** says a critical component for CAV to prevent any downtime when it comes to 9-1-1 services needs to be taken into serious consideration when retaining redundancy and reliability for 9-1-1 video calls. The 9-1-1 industry in Canada and the US system model of successful 9-1-1 video calling accessibility with the PSTN gateways provided by the PSAPs have a minimum of 99.97% redundancy and reliability. It needs to be applied to the VRS system to maintain more reliability. The current 99.95% is unacceptable as the VRS users would miss more calls in the connections.
51. **CDBC.VRS-DWCC** says there must be the maintenance of 99.97% redundancy and reliability of the call connections. The 99.97% is a much fairer systematic measure based on the size of the current number of 8,271 users of SRV Canada VRS.

Conclusion

52. Overall, **CDBC.VRS-DWCC** commends CAV for exceeding its rate of 80% of calls being answered within 120 seconds, achieving a wait time of 28 seconds system-wide. This rate is slightly below its goal of 30 seconds. The purpose of reducing its abandon call rate from 10% to 5% is successful because it has substantially reduced the number of outages for SRV Canada VRS since 2018. However, we are concerned with the slow, rather than exponential, growth of registered SRV Canada VRS users since 2016.
53. **CDBC.VRS-DWCC** is satisfied with the CAV's problem-solving initiative, which has substantially reduced outages by moving to a different Canadian provider. On the other hand, we think there needs to be greater attention to maintaining a minimum of 99.97% redundant and reliable connections to ensure fewer calls are missed. Communication inequity occurs if *SRV Canada VRS* users cannot catch incoming VRS calls, impacting their personal, employment, professional, and emergent needs. CAV must significantly reduce the high incidence of missed incoming calls to ensure they are on an equal basis with their hearing counterparts using voice calls.
54. There are two concerns that **CDBC.VRS-DWCC** has about CAV's reporting. Firstly, we are concerned about the lack of measurement on VIs transferring. VIs transfer impacts the quality of service *SRV Canada VRS* users receive. In some cases, it can create communication inequity in certain situations. Secondly, we are concerned about the lack of reporting on outages. More frequent and detailed reporting outages must be easily accessible to the public.

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